

Exhibit 51

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Affidavit of Phil Watts

1. My name is Phillip Watts and I make this declaration based on my personal knowledge.
2. I received a Bachelors in Science on December 2001 from Morehead State University and received a Masters in Science on July 2024 and a Masters of Arts on June 2007 from Morehead state University.
3. I have 23 years of experience working in Pre-K-12 education.
4. I have been the superintendent at Breathitt County School District since May 2017.
5. Prior to this, I held the positions of high school instructor from 2002 to 2007 and Director of District Wide Services: Technology, Facilities, etc. from 2007 to 2017 at Breathitt County School District.
6. In my position as a superintendent, I help to determine how the district should allocate our limited funds, including how our budget should be spent.
7. Throughout my time at Breathitt County Schools, first as a teacher and now as the superintendent addressing the effects of social media on students has been a significant challenge. The District has expended time and resources to try to keep children off social media during instructional time and inform them about the risks of social media. We have also used a significant number of free resources to achieve this goal.
8. In my experience, I have seen a growing problem of compulsive and problematic social media use among our students.
9. As a district, we have invested in many programs, products, and education to attempt to combat this issue, including the following:

Vendor	Program, Product, or Education	Percentage Attributable to Social Media
Kids First	Education Programs	20%
Hapara, Inc.	Hapara	75%
Remix Education	Education Programs	20%
Eduspire Solutions, LLC	E-Hallpass	25%
Millstone Labs, LLC	Education Programs	75-80%
Securly, Inc.	E-Hallpass	25%
Quill Corporation	Cell Phone Caddy	100%
Amazon	Cell Phone Holders	100%

10. In addition, our district has expended funds to repair damage to our bathroom resulting from TikTok challenges where students vandalized soap dispensers, sinks, stalls, and toilets in order to participate in these challenges. We have not been able to track down every cost that was expended. However, costs expended to Barnett / Home Depot totaling \$2,112 and to Jackson Electric & Plumbing totaling \$72 are 100% attributable to social media.

11. We have faced multiple instances of students creating fight pages, bullying pages, and gossip pages on various social media platforms that include our schools names and logos, including pages called Breathitt_Cheaters, Breathitt_Fights, Breathitt_Sleepers, and Breathitt.Sleepers. These groups have resulted in increased disruption in our schools as students arrange for fights to post to these pages or take photographs and videos of other students and post them to these pages.

12. The time that I have to spend on social media related impacts on students has substantially increased in the nearly 23 years that I have worked at Breathitt County Schools.

13. When I first started as the superintendent in June 2017, I spent approximately 20% of my work time on social media related concerns. By 2020, that number had risen to around 40%. Now in 2025, I spend anywhere from 75 – 80% of my work time addressing social media issues.

14. The time that I have to spend addressing social media impacts on students means that I have less time to dedicate to other aspects of my job. For example, teaching and learning.

15. Moreover, while having additional counselors would be helpful in addressing the negative impacts that the rising use of social media has had on students, the Breathitt School District has not been able to increase counselor hiring commiserate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

16. I regularly interact with counselors for children in grades 6 – 12 within the Breathitt School District. Based on these interactions, it is my understanding that our counselors for these grades spend the majority of their days addressing social media related concerns and that the amount of time counselors have had to spend on social media related concerns has increased substantially over the last several years.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 5, 2025.



Phillip Watts